

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,	)	CASE NO. 1:19-cv-145
	)	
Plaintiff,	)	JUDGE DAN AARON POLSTER
	)	
v.	)	MAGISTRATE JUDGE
	)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO,	)	
LLC, <i>et. al.</i> ,	)	
	)	
Defendants.	)	

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MOTION TO AMEND THE ORDER APPOINTING RECEIVER

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Mark E. Dottore, Receiver for South University of Ohio, LLC (“**South Ohio**”), Dream Center Education Holdings LLC (“**DCEH**”), Argosy Education Group LLC (“**Argosy**”) and the other Receivership Entities<sup>1</sup> files this motion, seeking to amend the Order Appointing Receiver [Dkt. No. 8, entered January 18, 2019] (the “**Order Appointing Receiver**”) as clarified by the Order Granting Receiver’s Motion for Order Clarifying Order Appointing Receiver [Dkt. No. 14, entered January 24, 2019] (the “**Clarifying Order**”), with the Amended Order Appointing Receiver attached hereto as Exhibit A (the “**Amended Receiver Order**”). The Amended Receiver Order incorporates certain changes requested by persons with significant interests in the litigation, including government entities and lenders.

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<sup>1</sup> All capitalized terms used but not defined in this motion shall have the meanings given to them in the Order Appointing Receiver.

For the convenience of the Court and others who are reviewing this motion, a copy of the Order Appointing Receiver is attached hereto as Exhibit B; a copy of the Clarifying Order, as Exhibit C; and, commencing with the decretal paragraphs, a copy of the Amended Receiver Order redlined against the Order Appointing Receiver, as Exhibit D.

WHEREFORE, the Receiver respectfully requests that the Court enter the Amended Receiver Order as soon as practicable.

Dated: February 25, 2019

**WHITMER & EHRMAN LLC**

/s/James W. Ehrman

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